DOCUMENT RESUME

ED 182 833 EA 012 441

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TITLE Tuition Tax Credits for Elementary and Secondary Education: Some New Evidence on Who Would Benefit. Technical Analysis Paper Number 7.
INSTITUTION Department of Health, Education, and Welfare, Washington, D.C. Office of the Assistant Secretary for Planning and Evaluation.
PUB DATE Sep 79
NOTE 18p.

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS Elementary Secondary Education; *Enrollment; *Family Income; *Geographic Regions; *Minority Group Children; *Private Schools; *Tuition
IDENTIFIERS *Tax Credits

ABSTRACT

Much of the controversy in discussions of tuition tax credits for elementary and secondary education has been over the question of who would benefit from the various proposals. This report presents data from the 1978 October supplement to the Current Population Survey that show, for the first time, who attends private schools and what tuitions they pay. Private school attendance rates and median tuitions are shown for students grouped by grade level and by region, race, and family income. These data then are used to estimate the average size and distribution of tuition tax credits which would accrue to each of these student groupings under two sample tax credit plans. Findings indicate the following: students in the South and West pay more to attend private schools than students in the northeastern and north central regions; median private school tuitions for black students are higher than those for white and Hispanic origin students; and, in general, tuition levels do not reflect ability to pay as measured by family income. This report discusses the policy implications of these findings and presents suggestions for modifying tuition tax credit proposals to target benefits more heavily on the disadvantaged. (Author)

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ED182833

Technical Analysis Paper Number 7

TUITION TAX CREDITS FOR ELEMENTARY AND SECONDARY EDUCATION:

Some New Evidence on Who Would Benefit

by

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September 1979

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EA 012 441

Abstract

Much of the controversy in discussions of tuition tax credits for elementary and secondary education has been over the question of who would benefit from the various proposals. Yet, until now, accurate estimates of the distributive impact of tuition tax credits have been unavailable, due to the lack of nationally representative information about the tuitions paid by private school students. This report presents data from the 1978 October Supplement to the Current Population Survey that show, for the first time, who attends private schools and what tuitions they pay. Private school attendance rates and median tuitions are shown for students grouped by grade level and by region, race and family income. These data then are used to estimate the average size and distribution of tuition tax credits which would accrue to each of these student groupings under two sample tax credit plans: Plan A would provide a credit for 35 percent of tuition up to $100 per student; Plan B would cover 50 percent of tuition up to $500 per student.

This analysis yields some surprising findings:

- — students in the South and West pay more to attend private schools than students in the Northeastern and North Central regions;
- — median private school tuitions for black students are higher than those for white and Hispanic origin students; and
- — in general, tuition levels do not reflect ability to pay as measured by family income.

These findings result in distributions of tax credits that, depending on the plan, may depart significantly from the expectations of those who have participated in the tax credit debates. This report discusses the policy implications of these findings and presents suggestions for modifying tuition tax credit proposals to target benefits more heavily on the disadvantaged.

Acknowledgements

The tuition data used in this report were collected as part of a joint project between the Department of Health, Education, and Welfare and the Census Bureau to expand coverage of private school enrollment in the 1978 October Supplement to the Current Population Survey. The author wishes to thank Alan Ginsburg and Brenda Turnbull for their comments on the report and Sandra Richardson for preparing the manuscript.

FEB 2 6 1980

TUITION TAX CREDITS FOR ELEMENTARY AND SECONDARY EDUCATION: SOME NEW EVIDENCE ON WHO WOULD BENEFIT

Who would benefit from Federal tuition tax credits for elementary and secondary education? Speculation about this question has fueled much of the controversy over tuition tax credit proposals. Opponents have charged that tax credits would benefit the traditionally Northern, white, and wealthy private school population. Proponents challenge this characterization, claiming that the mix of private school students has changed in recent years, and that tax credits would expand private school opportunities for minorities and the poor, providing significant benefits to families in all regions of the nation.[1] Yet accurate estimates of the distributive impact of various tax credit proposals have been unavailable, due to the lack of nationally representative information about the tuitions paid by private school students. Now, because the October 1978 Supplement to the Current Population Survey (CPS) included a question on private school tuitions, data are available for the first time that show who attends private schools and what tuitions they pay.[2]

This report examines the 1978 CPS data on private school enrollment and tuition patterns, highlighting some surprising findings about the variation in tuitions paid by different groups of students. Private school attendance rates and median tuitions are presented for the nation as well as for students grouped by region, race, and family income.

Although attendance rates and tuitions determine to a large extent how the benefits of tax credits would be allocated, the design of a tax credit plan would also have an impact. In order to illustrate the effects of some of the most frequently proposed design features, including magnitude of the credit allowed, estimates of the average size and distribution of credits under two sample plans are provided for each of the above student groupings. The two sample tax credit plans closely resemble proposals considered by Congress last session and introduced

in both Houses this year. Plan A would allow a tax credit for 35 percent of tuition up to $100 per student.[3] Plan B (last year's Moynihan-Packwood proposal) provides a credit for 50 percent of tuition, with a ceiling of $500 per student. These estimates will be used to assess claims that have been made about who would benefit. Finally, the policy implications of these findings are discussed and suggestions presented for modifying tax credits proposals to target benefits more heavily on the disadvantaged.

National Patterns

Traditionally, private school attendance rates have been higher among the nation's elementary school students than among high school students. This pattern is also evident in the 1978 data (Table I): 11.4 percent of all elementary school children attend private schools, compared with 8.2 percent of high school students. Tuition differences between the two levels are even more pronounced, with the median tuition for private high school students more than double that for elementary students ($901 for high school students and $356 for elementary students). These attendance and tuition patterns for elementary and high school students appear whether students are grouped by region, race, or family income.

TABLE 1: National Patterns of Private School Enrollment, Tuition, and Distribution of Tax Credits

					Plan A (35%/$100)		Plan B (50%/$500)	
	Total Enroll. (000's) (1)	Total Priv. Enroll. (000s) (2)	Priv. Attend. Rate (3)	Median Tuition (4)	Median Bene./ Child (5)	Est.Total Benefits (000's) (6)	Median Bene./ Child (7)	Est.Total Benefits (000's) (8)
Elementary (Grades 1-8)	28,467	3,233	11.4%	$356	$100	$323,300	$178	$ 575,474
High School (Grades 9-12)	15,131	1,244	8.2%	$901	$100	$124,400	$431	$ 561,044
TOTAL....	43,598	4,477	10.3%	NA	$100	$447,700	NA	$1,136,518

The differences in private school attendance rates and tuitions have major consequences for the size and distribution of tax credits. Under Plan A, the national median tax credit for both elementary and high school students would be $100 per child, the maximum credit allowed.[4] Because the median credit would be equal for the two levels, the fact that most private school students are enrolled in the elementary grades would result in over 70 percent of the total amount for tax credits being claimed on behalf of elementary students (roughly $323 million out of $448 million). In contrast, the $500 ceiling under Plan B would allow the larger tuitions paid for high school students to yield a higher median credit for these students ($451 per high school student compared with $178 per elementary student). Consequently, the share of benefits claimed on behalf of high school students would be much higher than under Plan A, nearly equaling the amount for elementary students: Plan B would yield about $561 million in tax credits for high school students and $575 million for elementary students.

Regional Patterns

Would tax credits be distributed disproportionately across regions? Some have charged that tax credits primarily would aid families in the North, where private school attendance rates historically have been highest. However, it appears that regional differences in private school attendance rates have diminished somehwat in recent years. The declines that plagued Catholic schools, especially in the Northeastern and North Central States, in the late 1960s and early 1970s have been well publicized. And more recent evidence indicates that private schools are increasingly popular in the South and West.[5] Yet despite these shifts the 1978 data show that significant regional differences remain: private school attendance rates remain highest in the Northeastern and North Central States and lowest in the South and West (Table II).

TABLE II: Regional Patterns of Private School Enrollment, Tuition, and Distribution of Credits

Region	Share of Total Enroll. (1)	Share of Tot. Priv. Enroll. (2)	Priv. Attend. Rate (3)	Median Tuition (4)	Plan A (35%/$100) Med.Tax Cred./ Child (5)	Plan A (35%/$100) Share of Total Benefits (6)	Plan B (50%/$100 Med.Tax Cred./ Child (7)	Plan B (50%/$100 Share of Total Benefits (8)
Elementary								
Northeast	23%	31%	15.2%	$250	$ 88	30%	$ 125	20%
North Central	27	30	12.9	238	83	28	119	19
South	33	25	8.4	636	100	27	318	41
West	17	14	9.6	510	100	16	255	19
	100%	100%				100%		100%
Secondary								
Northeast	23%	34%	12.1%	$917	$ 100	34%	$ 459	35%
North Central	28	28	8.2	819	100	28	410	25
South	31	25	6.6	959	100	25	480	26
West	18	13	5.9	948	100	13	474	14
	100%	100%				100%		100%

In the absence of tuition data, previous speculation about the regional distribution of tax credits has assumed that tuitions do not differ substantially by region. However, the CPS data reveal the fallacy of this assumption. In fact, tuitions vary significantly across the nation, with students in the South and West paying more to attend private school than their counterparts in the North Central and Northeastern regions. These regional differences are especially large in the elementary grades, where tuition ranges from a median of $238 in the North Central region to a median of $636 in the South. This pattern probably reflects the dominance in the North Central and Northeastern States of Catholic parish elementary schools, which receive relatively large church subsidies and charge low tuitions. Catholic secondary schools, which also predominate in these regions, rely more heavily on tuition for operating expenditures. In this respect they are more like other private schools, and this similarity results in rates which are comparable to those of other private high schools. [6]

Because of the regional differences in private school attendance rates, many people have assumed that tax credit benefits would be most heavily concentrated among families in the Northeastern and North Central States. Indeed, at both the elementary and high school levels under Plan A, and at the high school level under Plan B, the regional distribution of tax credits conforms to these predictions. Under Plan A, this distribution occurs because the median credit for most students would be $100. Although tuition differences do affect the size of credits under Plan B, these differences are not large enough at the high school level to offset the impact of attendance rates on the distribution of credits across regions.

In sharp contrast, however, families of private elementary children in the South, where median tuition is highest, would claim a disproportionately large share of the benefits under Plan B. Although private elementary students in the South represent only 25 percent of all private enrollments they would generate 41 percent of the total amount for tax credits.

Patterns by Race

How minorities would fare under tuition tax credit plans has been a particularly controversial issue. Some people have cited earlier CPS data, showing a small proportion of non-white students attending private schools, to support the assertion that tax credits would primarily benefit white students. Yet others have emphasized the historical importance of private (primarily Catholic) schools in providing educational opportunities for immigrant populations, and have pointed to recent increases in private enrollment among minority children as evidence of their continuing commitment to provide equal educational opportunities.[7]

The 1978 data reveal that, despite recent increases in private school enrollment among blacks and students of Hispanic origin, pronounced differences exist in private school attendance rates for students of different racial and ethnic

backgrounds (Table III). Differences between black and white students are especially large, with private school attendance rates among white students nearly three times higher than among black students. Students of Hispanic origin also are less likely than white students to attend private schools, particularly at the high school level.

The information on tuitions shows for the first time that black students tend to pay more to attend private schools than their white and Hispanic origin peers. Tuition differences are greatest at the elementary level, where the median tuition for black students is 23 percent higher than the median for students of Hispanic origin and 39 percent above the median for white students.

TABLE III: Patterns of Private School Enrollment, Tuition, and Distribution of Tax Credits for Students Grouped by Racial/Ethnic Background

Racial Ethnic Back-ground*	Share of Total Enroll. (1)	Share of Total Priv. Enroll. (2)	Priv. Attend. Rate (3)	Median Tuition (4)	Plan A 35%/$100 Median Cred./ Child (5)	Plan A 35%/$100 Share of Total Benefits (6)	Plan B 50%/$500 Median Cred./ Child (7)	Plan B 50%/$500 Share of Total Benefits (8)
Elementary								
White	83%	92%	12.6%	$ 342	$100	92%	$ 171	88%
Black	15	6	4.7	477	100	6	239	8
Hispanic Origin	(6)	(6)	9.9	388	100	(6)	194	(6)
High School								
White	82%	93%	9.0%	$ 901	$100	93%	$ 451	95%
Black	15	5	2.9	917	100	5	459	5
Hispanic Origin	(6)	(3)	5.0	847	100	(3)	424	(3)

* This table does not include information for children of races other than white or black. Also, because the CPS question on national origin is separate from the race question, persons classified as being of Hispanic Origin may be of any race. Consequently, the figures shown for Hispanic Origin students are not additive.

Why these variations occur has been an especially sensitive topic of debate. Many strongly believe that private schools discriminate against minorities and provide a haven for those wanting to avoid integration of public schools. Others insist that these differences in private attendance rates and tuition can be explained by such factors as religious background, place of residence, or family income.[8] Unfortunately, while the data presented here document the existence of variations at the national level, they provide few clues for understanding why such differences occur.

Because black students represent a low proportion of private school enrollments, it is not surprising that they would generate only a small portion of tax credits, a share much lower than their representation in the general student popoulation. Although black children represent about 15 percent of all school children in both elementary and high school grades, they would account for only 6 percent of credits under Plan A and 8 percent under Plan B at the elementary level, and only 5 percent of benefits under either plan at the high school level. Tax credits for families of Hispanic origin students enrolled in private elementary schools would be distributed roughly in proportion to their share in the general population of school children. At the high school level, though, these families would receive a total share of funds that would be somewhat smaller than their share of the school population. The vast majority of tax credits for both elementary and high school students under either plan would be claimed by families of white private school children.

Patterns by Family Income

Perhaps the objection most often raised against tuition tax credits is that they would be regressive, since children from the wealthiest families tend to be over-represented in the private school population. Proponents of credits argue that

private schools serve students from a wide range of economic backgrounds, and that tax credits are needed to maintain and expand private school opportunities for low and middle income students.[8]

While it is true that students from all family income groupings attend private school, the 1978 CPS data show that the likelihood of attending private school increases sharply as family income rises (Table IV). Thus, private school attendance rates for students from families with incomes of $25,000 or more are about five times higher than the rates among children from families with incomes of less than $5,000.

TABLE IV: Patterns of Private School Enrollment, Tuition, and Distribution Tax Credit for Students Grouped by Family Incomes

Family Income	Share of Total Enroll. (1)	Share of Tot. Priv. Enroll. (2)	Priv. Attend. Rate (3)	Median Tuition (4)	Plan A 35%/$100 Med. Tax Cred./ Child (5)	Plan A 35%/$100 Share of Total Benefits (6)	Plan B 50%/$100 Med. Tax Cred./ Child (7)	Plan B 50%/$100 Share of Total Benefits (8)
Elementary								
Under $5,000	9%	3%	3.4%	$243	$ 96	3%	$137	2%
$5,000-7,499	9	4	5.6	405	100	5	203	5
$7,500-9,999	8	5	7.4	263	92	5	132	4
$10,000-14,999	20	17	9.9	271	95	17	136	13
$15,000-19,999	17	20	13.4	343	100	20	172	19
$20,000-24,999	13	18	15.6	323	100	19	162	16
$25,000 & Over	15	23	17.1	514	100	24	257	33
Not Reported	8	9	11.9	337	100	9	169	8
	100%	100%				100%		100%
High School								
Under $5,000	7%	3%	2.9%	$687	$100	3%	$344	2%
$5,000-7,499	8	3	2.5	842	100	3	421	2
$7,500-9,999	7	4	5.0	824	100	4	412	4
$10,000-14,999	16	11	5.7	777	100	11	389	10
$15,000-19,999	16	15	7.7	810	100	15	405	14
$20,000-24,999	14	15	8.8	876	100	15	438	15
$25,000 & Over	21	37	14.1	994	100	37	497	41
Not Reported	9	12	10.9	931	100	12	466	13
	100%	100%				100%		100%

In contrast to this strong pattern for attendance rates, no consistent relationship appears to exist between family income and median tuition level. In general, median tuitions fluctuate across family income categories. The exceptions are at the extremes of the income scale, where ability to pay — as measured by family income — seems to be reflected in tuition levels. Private school students from families with incomes of $25,000 or more pay median tuitions 44 percent higher than the national median for elementary students and 10 percent above the national median for high school students. At the opposite end of the income scale, tuitions are significantly lower than the national median (23 percent lower in elementary grades, 24 percent lower in high schools).

Table IV lends support to the speculation that tax credits would be regressive across family income categories. The share of benefits under each of the plans, at both the elementary and secondary levels, increases for students from families of progressively higher income levels. While children in families with incomes of less than $5,000 represent 9 percent of elementary and 8 percent of high school enrollments, their families would receive only 3 percent of the amount of credits under Plan A and 2 percent under Plan B. Moreover, these percentages may be overstated, since both sample plans assume that a family with no tax liability would receive a refund (or payment) rather than a credit. In fact, however, only about half of the plans proposed thus far have included a "refundability" provision, and without such a provision it is likely that tax credits would be of no benefit to low income families. In contrast, although children from families with incomes of $25,000 or more account for 15 percent of elementary and 21 percent of high school enrollments, they would generate from 24 to 33 percent of credits at the elementary level and 37 to 41 percent of the credits

at the high school level. The share of benefits for families in the top income categories is highest under the $500 ceiling, which permits the higher tuitions paid for children in this category to yield large credits.

Policy Implications

These findings about private school enrollment and tuition patterns and who would benefit from tax credits contain several important implications for those who would design future tax credit plans. Before drawing these implications, one qualification on the preceeding analysis merits discussion: In estimating how benefits would be distributed, no attempt has been made to predict changes in private school attendance rates or tuition levels that could occur in response to tax credits. However, this may not represent a serious limitation on the results since it would take a strong, differential change in attendance rates among the various students groups to alter significantly the distribution of tax credits that we have predicted, and such a change is unlikely for several reasons. First, although the evidence is very limited, earlier research suggests that private school enrollments are not particularly sensitive to changes in tuition levels.[9] However, even if one assumes that private enrollments are quite sensitive to tuition changes, plans like those discussed here probably would have only a limited effect on enrollments. Plan A, which would cover only a small portion of tuition and allow a low maximum credit, would not significantly lower the price of private schools for most families. Although Plan B's terms might provide more of an incentive for parents to send their children to private schools, they would also offer a significant opportunity for schools to raise tuitions and thereby prevent a lowering in actual costs to parents. Finally, even if the demand for private education increased substantially in response to tax credits the private education sector presumably would need some lead time to accommodate

a large influx of students. Thus, although we cannot accurately predict responses to tax credits, our estimates provide a good forecast of the initial impact of tax credits.

One aspect of tax credit plans of obvious interest to policy makers is their cost. The costs of the plans examined here would differ greatly (see Table I). The relatively modest terms of Plan A would require tax expenditures totalling less than one-half the amount which would be necessary for Plan B: Plan A would result in nearly $448 million worth of credits; by comparison, Plan B would cost over $1.1 billion in foregone tax revenues.

Perhaps the most important of our findings in terms of its implications for tax credits is that, despite reports of recent shifts in the composition of private school enrollments, they remain more Northern, white and wealthy than the general school population. For the most part, distribution of benefits under the plans we examined would be proportional to private school attendance rates: that is, the total amount of tax credits garnered by families in a particular category would depend simply on how many children of such families attend private schools. This occurs at both levels under Plan A, since the majority of families would receive $100 per student. Although the $500 ceiling under Plan B would allow credits to reflect tuition differences more closely, only at the elementary level are tuition differences among the various student groupings large enough to have much impact on the distribution of benefits from the plan. Under Plan B, tuition differences among private elementary students would significantly increase the share of credits going to the South and to the wealthiest families.

These findings will undoubtedly be used to support the position of those who oppose any aid to private education. The data may also persuade others to look for alternatives to tax credits for providing such aid. For those who remain

convinced that the tax credit approach should be pursued, these results may form the basis for further refinements. Given the traditional Federal commitment to assure equal educational opportunities for minority and low income children, a likely criterion policy makers will use in evaluating tax credit plans is the extent to which they promote this goal. Yet the findings here suggest that minority and low income families would claim only small shares of tax credits under typical plans. Thus, if the share of benefits to these groups is to be increased, provisions must be specially designed for this purpose. Because the causes of the under-representation of minorities in private schools are not clear, it is difficult to design provisions tailored to their needs. In the absence of better information, perhaps the best that can be done is to ensure the enforcement of, or strengthen, civil rights provisions relating to private schools.

Provisions to target more benefits on low income families are easier to design. As mentioned earlier, a refundability provision would assure that families with little or no tax liability share in the benefits. A provision excluding families above a certain income level would avoid tax expenditures to the wealthiest families. Still another possible targeting approach would be to design a graduated scale of credits so that families whose private school expenses represent a greater portion of income would receive larger credits than those families for whom such expenses take up a lesser share of income.

This report represents an initial step in bringing nationally representative data to bear on the topic of tuition tax credits, but many questions remain unanswered. For example, to what degree to patterns of private school attendance and tuition for particular groups of students vary among the different types of private schools, and in different locations across the nation? Why do these patterns occur and have they changed over time? What would be the response,

in terms of private school enrollments and tuitions, to tuition tax credits or other changes in Federal policy on private education? As the scope and quality of information about private education continue to improve, further exploration of these and other questions will become possible. For now, this report moves well beyond the very speculative estimates which have formed the basis for past discussions of tuition tax credits, setting the stage for a better-informed debate.

FOOTNOTES

1/ For a thorough and lively discussion of the tuition tax credit issue see Phi Delta Kappan, December 1978 which includes "The Case for Tax Tuition Credits" by Daniel P. Moynihan (p. 274) and "The Case Against Tuition Tax Credits" by Ernest F. Hollings (p. 277).

2/ The Current Population Survey is a monthly sample survey of approximately 50,000 households (or about 1 in 1,500 households) conducted by the Bureau of the Census. Each October, data are obtained on the school enrollment of persons 3 to 34 years old. A question on whether each person enrolled attends a public or private school is asked and public or private enrollment can be cross-tabulated with characteristics such as regional location, family income, and racial or ethnic background. At the request of the Office of the Assistant Secretary for Planning and Evaluation and the National Center for Education Statistics, the following question on private school tuitions was included for the first time in the October 1978 survey: "What is the amount of tuition and fees for this school year at the school [your child] is attending? (Include only fees required for school entry; exclude room and board, books, uniforms, school supplies and lunches.)"

3/ Plan A, covering 35 percent of tuition up to $100 per student, is very similar to the proposal for elementary and secondary tuition tax credits contained in H.R. 366, 96th Congress, First Session.

4/ Throughout the tables in this analysis, median tax credits are calculated by multiplying the median tuition for each category by the percentage of tuition costs covered under each sample plan. Where the median credit exceeds the maximum amount allowed under the plan, the maximum amount is shown. Thus where the maximum amount appears it is not a true median; rather, it indicates that the tax credit for at least 50 percent of the children in the category would equal the maximum credit allowed.

5/ "Recent Trends in U.S. Non-Public Schools," Donald Erickson, Richard L. Nault, and Bruce S. Cooper, Chapter III, Declining Enrollments: The Challenge of the Coming Decade, National Institute of Education, March 1978, and The Condition of Education: 1977 Edition, National Center for Education Statistics, p. 192.

6/ National Catholic Education Association Data Bank, "Catholic Elementary Schools and Their Finances, 1979," and "Catholic High Schools and Their Finances, 1979", and Erickson, Nault and Cooper, op.cit.

7/ Numerous examples of both lines of argumentation can be found in the published Senate hearings on tuition tax credits: Tuition Tax Relief Bills, Hearings Before the Subcommittee on Taxation and Debt Management Generally of the Committee on Finance, United States Senate, Ninety-fifth Congress, January 18, 19, and 20 1978, in Two Parts. In particular, see the Statement of Will D. Davis, President of the National School Boards' Association (Part I, p. 337) for the opposition view and the Statement of Donald A. Erickson, Director of the Center for Research on Private Education, University of San Francisco (Part I, p. 157), supporting tuition tax credits.

8/ Ibid.

9/ Kenneth M. Brown, "Enrollment in Non-Public Schools," in Economic Problems of Non-Public Schools prepared by the Office of Educational Research, University of Notre Dame, for the President's Commission on School Finance, 1972.